

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

MICHELLE BROWN

PLAINTIFF

vs.

CAUSE NO.: 2:25-cv-00020-TBM-RPM

**PROFESSIONAL SECURITY
CORPORATION**

DEFENDANT

DEFENDANT'S MOTION TO QUASH SERVICE OF PROCESS

Defendant Professional Security Corporation ("Defendant") specially appears¹ and requests that Plaintiff Michelle Brown's erroneous attempt to service process on Defendant be quashed:

1. On May 8, 2025, this Court entered an order permitting *Pro se* Plaintiff Michelle Brown to serve process on Defendant. Doc. No. 7.

2. *Pro se* Plaintiff purported to do that on May, 23, 2025 by serving Brian Dickson. Doc. No. 9.

3. *Pro se* Plaintiff's service was improper under Rule 4.

4. Under Rule 4, "[a] corporation can be served 'by delivering a copy of the summons and of the complaint to an officer, a managing or general agent, or any other agent authorized by appointment or by law to receive service of process.'" *See, e.g., C.H. Robinson Co., Inc. v. J.R. Produce and Food Service, Inc.*, 2025 WL 1742568, *3 (W.D. Tex. 2025) (quoting Rule 4).

5. As shown by Ex. A from the Secretary of State's website, Brian Dickson is not an officer or registered agent of Defendant. Ex. A.

¹ Defendant does not consent to jurisdiction and does not waive (and expressly preserves) any defenses to this action, including that it is not the real party in interest. *See, e.g., Powell v. Biloxi Police Dept.*, 2011 WL 2457857 (S.D. Miss. 2011) (acknowledging special appearance for purpose of contesting service).

6. Because *Pro se* Plaintiff did not sue anyone authorized to accept service on behalf of Defendant, service must be quashed. *See, e.g., Reese v. Great W. Cas. Co.*, 2019 WL 4930233, *4 (E.D. La. 2019) (explaining that a corporation must generally be served by personal service on its agent for service of process and finding service on receptionist insufficient); see also *Silva v. K. Hovnanian First Homes, LLC*, 2007 WL 2827534, *1-2 (M.D. Fla. 2007) (granting motion to quash where plaintiff served wrong person).

7. Given the straightforward nature of this request, Defendant asks that any requirement of a separate memorandum in support be waived.

For these reasons, Defendant requests that the purported service at Doc. No. 9 be quashed.

Dated: June 26, 2025.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ G. Todd Butler

G. Todd Butler, MB #102907
1905 Community Bank Way, Suite 200
Flowood, Mississippi 39232
Post Office Box 320159
Flowood, Mississippi 39232-0159
Telephone: 601-352-2300
Telecopier: 601-360-9777
Email: butlert@phelps.com
***Attorney for Defendant Professional
Security Corporation***

CERTIFICATE OF SERVICE

I, G. Todd Butler, certify that I had a copy of this Motion electronically filed with the Clerk of the Court, using the CM/ECF system, and that I also had a copy mailed to *Pro se* Plaintiff at 1430 West 7th Street in Hattiesburg, MS 39401.

SO CERTIFIED, this the 26th day of June, 2025.

/s/ G. Todd Butler
G. Todd Butler